

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE CONSUMER ADVOCATE

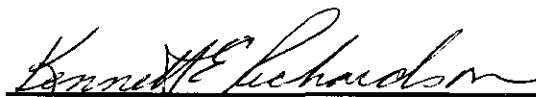
Classification and Fees For Confirm)

Docket No. MC2002-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS NORMA B. NIETO
(OCA/USPS-T3-1-3)
May 3, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-18 dated May 1, 2002, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T3-1. At page 12 of your testimony, footnote 7, you indicate that there was an average of 3.0 scans per piece. USPS-LR-1 indicates that both Origin and Destination Confirm® mail pieces receive an average of 3 scans during mail processing.

- a. In your cost analysis, did you assume that both the Origin and Destination Confirm® mail pieces received an average of 3 scans during processing?
- b. If your response to part “a” of this interrogatory is other than affirmative, please identify the average number of scans you assumed a destination Confirm® mail piece would receive. Include in your response the rationale for using a scan rate other than the average indicated in USPS-LR-1.
- c. If your response to part “a” of this interrogatory is other than affirmative, please identify the average number of scans you assumed an origin Confirm® mail piece would receive. Include in your response the rationale for using a scan rate other than the average indicated in USPS-LR-1.

OCA/USPS-T3-2. At page 16 of your testimony, you indicate that “[p]rogram support costs include costs of dedicated program labor and contractor support.”

- a. Are you assuming that the Confirm® dedicated program labor is equivalent to 2,080 man-hours or the equivalent of one person full time for a year?
- b. Please explain how you determined the number of “man-hours” needed to provide Confirm® program labor support. For example: one person is capable of performing 2,080 work hours per year and can support up to “x” number of customers.

- c. In preparing your cost analysis, please provide the estimate you used for the number of Confirm® calls a given customer is likely to make in a year regarding a given Confirm® mailing. If you did not estimate the number of calls made by clients to USPS support personnel, please explain.
- d. Considering your response to part “c” of this interrogatory and in preparing your cost analysis, please provide the estimate you used for the length of time per Confirm® call a USPS support personnel needed to answer the average customer call. If you did not estimate the amount of time taken by USPS support personnel to respond to a customer call, please explain.
- e. When you prepared your cost analysis, did you assume that the USPS customer support personnel were dedicated solely to the Confirm® product?
 - 1. If not, please identify the proportion of time you assumed a customer support personnel spent responding to Confirm® issues.
 - 2. If you did not consider whether or not USPS customer support personnel were dedicated solely to Confirm®, please explain.
- f. Assume that the Postal Service’s level of customer interest in using the Confirm® service exceeds the estimated 1,126 subscriptions. Please explain what impact an increased level of interest in using Confirm® would have on your cost estimates of the level and cost of the dedicated program labor and contractor support needed. For example, an “x percent” increase in subscriptions would require a “y percent” increase in dedicated program labor and contractor support costs. If there is no impact on costs with an increase in subscriptions, please explain.

OCA/USPS-T3-3. The following information is requested in an attempt to better understand the production and technology processes that surround the innovative Confirm® product. On page 5 of your testimony, you state the following: "Upon mapping the technology and production processes, I identified the resources (both new and existing cost components) drawn upon by Confirm®, including technology, maintenance, and program management." Please provide a copy of the maps you created of the technology and production processes.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.


Kenneth E. Richardson

Washington, D.C. 20268-0001
May 3, 2002